

| | |
|----------------------|--|
| IN THE MATTER | of the Resource Management Act 1991 (RMA) |
| IN THE MATTER | of hearing submissions and further submissions on the Proposed Waikato District Plan |
| IN THE MATTER | of the management of Hazardous Substances –Hearing 8A |

**FINAL SUBMISSIONS FOR THE LPG Association ON HAZARDOUS SUBSTANCES CHAPTER
19 May 2020**

The LPG Association refers to the submission made by the Oil Companies, which is supported by the LPG Association. Particularly the response on the Councils gap analysis, which we believe did not fulfil the stated requirement.

The points we made in our original submission still stand. Duplication by Council by imposing resource consent requirements on LPG, when the design and certification for LPG sites are covered by existing HSWA and HSNO **detailed technical regulations**, is duplication.

None of the arguments presented identify gaps in the current regulations that need to be filled by Council. It seems to be a vague general approach, which would allow Council to introduce any requirements they believe are justified.

The Association has collaborated with other parties to this process to produce an amended version of the Chapter 10 Hazardous Substances provisions. We believe this provides a workable framework for dealing with Major Hazard Facilities and all other LPG related installations.

It is submitted that these plan provisions recommended by opposing submitters is appropriate and (based on the evidence) meets the relevant statutory tests, including s32 and s32AA RMA.

Peter Gilbert
Executive Director
LPG Association of New Zealand.
Ph 04 914 1765
Email peter@lpga.org.nz